

# Glaser Weil

10250 Constellation Blvd.  
19th Floor  
Los Angeles, CA 90067  
310.553.3000 TEL  
310.556.2920 FAX

Thomas P. Burke Jr.

Direct Dial  
310.556.7807

Direct Fax  
310.843.2607

Email  
tburke@glaserweil.com

November 5, 2021

## VIA ECF

Honorable George B. Daniels  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street  
New York, NY 100067

Re: *Gaffney v. Muhammad Ali Enterprises, LLC, et al.*  
Civil Nos. 1:18-cv-08770-GBD-OTW; 1:20-cv-07113

SUBSCRIBED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.

NOV 08 2021

## UNOPPOSED LETTER MOTION FOR SEALING OF EXHIBITS

Dear Judge Daniels:

Plaintiff Michael Gaffney respectfully submits this unopposed letter motion for approval to file Exhibits 15, 16, 17, 18, 19, and 21 to the Declaration of Thomas P. Burke Jr. (Dkt. No. 137-1) filed in support of Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment. (Dkt. No. 137.) Counsel for the parties met and conferred by email on November 5, 2021, and agreed to file these exhibits under seal.

Plaintiff has filed placeholders for Exhibits 15, 16, 17, 18, 19, and 21 on the public docket in support of its Opposition to Defendants' Motion for Partial Summary Judgment. These exhibits contain commercially sensitive information of Defendants, including sales figures, royalty rates, and the identities of sublicensees. Plaintiff has agreed and stipulated that sealing these Exhibits is appropriate at this time, and requests that the Court allow the public documents to remain sealed for the reasons detailed in Defendants' previous letter motion. (Dkt. No. 121.) The information contained in these Exhibits is of a similar nature to that which the Court ordered to remain sealed on October 20, 2021. (Dkt. No. 131.)

In connection with this letter motion, Plaintiff is filing a unredacted versions of the exhibits to the Declaration of Thomas P. Burke under seal. Plaintiff respectfully requests that these unredacted versions remain under seal.

Honorable George B. Daniels  
November 5, 2021  
Page 2

Respectfully,

*/s/ Thomas P. Burke Jr.*

THOMAS P. BURKE JR.  
for GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

TPB:tpb